

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kendall McKinley Washington

Case: 2:21-mj-30434

Assigned To : Unassigned

Assign. Date : 9/14/2021

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

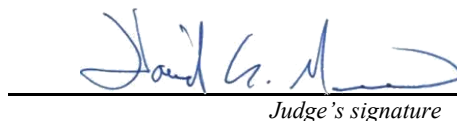
On or about the date(s) of April 15, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

21 USC Section 841(a)(1)

possession with intent to distribute a controlled substance

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: September 14, 2021City and state: Detroit, Michigan
*Complainant's signature*Brent Halbert, Special Agent, Drug Enforcement Administration
Printed name and title
*Judge's signature*David R. Grand, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Brent Halbert, Special Agent of the Drug Enforcement Administration (DEA), having been duly sworn, do hereby state and depose as follows:

INTRODUCTION

1. This is an affidavit seeking an arrest warrant for Kendall WASHINGTON. In the early morning of April 15, 2020, DEA agents and officers executed a search warrant at a Detroit apartment. WASHINGTON and his minor son were the only people there. During a search, Agents and officers found approximately two pounds of crystal methamphetamine, five kilograms of cocaine, and 200 grams of crack cocaine. They also found mail belonging to Kendall WASHINGTON and clothing that appeared to be WASHINGTON's.

2. I am a Special Agent of the DEA, and, as such, I am an investigative or law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is authorized by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 21, United States Code, Section 801, et seq., and Title 18, United States Code, Section 2516.

3. I have been a DEA Special Agent since August of 2010. I am currently assigned to the DEA Detroit Field Division Office, Detroit, Michigan.

During my employment with DEA, I have participated in numerous investigations into controlled substance distribution and money laundering networks and have interviewed defendants, cooperating sources, and others who were importers, facilitators, transporters, sellers, distributors, or users of controlled substances or who were involved in and familiar with the methods and practices of drug traffickers and money launderers. I have participated in and served as the affiant for numerous search warrants in which controlled substances, drug paraphernalia, currency, and records were discovered. I have made arrests for violations of federal and state law.

4. The information set forth below is for the limited purpose of establishing probable cause that Kendall WASHINGTON possessed a controlled substance intending to distribute it, in violation of 21 U.S.C. § 841. Therefore, this affidavit does not necessarily contain all of the information collected during my investigation, but includes only those facts necessary to establish probable cause.

5. On April 14, 2021, the Honorable Elizabeth Stafford, United States Magistrate Judge, authorized a search warrant for 8756 Epworth Street, Detroit.

6. On April 15, 2021, at approximately 6:00 a.m., the DEA Detroit Special Response Team (SRT) executed that warrant. The location 8756 Epworth had been divided up into four apartments. Agents/Officers wearing clearly marked

police attire/equipment knocked and announced their presence and purpose prior to entering the residences. Upon conducting a safety sweep of the residence, agents/officers detained Kendall WASHINGTON and his juvenile son in Unit 2N. The door to apartment 2N was unlocked.

7. Agents/Officers conducted further search of apartment 2N, a two-bedroom apartment, and found approximately two pounds of crystal methamphetamine, five kilograms of cocaine, and 200 grams of crack cocaine as more specifically described below:

- **Bedroom:** 45 grams of crack cocaine (all weights are in gross, e.g., including the packaging material, and all drugs were field tested) and 45 grams of cocaine inside plastic bags and documents with Kendall WASHINGTON's name on them inside the northeast bedroom;
- **Closet:** a 1.435-kilogram brick of cocaine and a 1.215-kilogram brick of cocaine on a shelf in the hallway closet;
- **Kitchen:** 950 grams of crystal methamphetamine and 2.96 kilograms of cocaine in a plastic bag on the kitchen floor;
- **Living Room:** plastic baggies containing 60 grams of crack cocaine, 45 grams of cocaine, 50 grams of cocaine, and 80 grams of cocaine, which were (in turn) inside a white shoe on the living room floor and

another plastic bag containing 50 grams of cocaine underneath a television in the living room.

Agents/Officers also observed personal items, such as clothing, consistent with WASHINGTON and his juvenile son being the sole occupants of the apartment. Furthermore, agents/officers conducting surveillance of 8756 Epworth in the weeks leading up to the execution of the search warrant observed WASHINGTON at the location on an almost daily basis, consistent with 8756 Epworth being used as his primary residence.

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8. Based on the foregoing, as well as my training and experience, I believe there is probable cause to support the issuance of a criminal complaint against Kendall WASHINGTON for possession with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

A handwritten signature in black ink, appearing to read "B. Halbert", written over a horizontal line.

Brent Halbert
Special Agent, DEA

Sworn to before me and signed in my presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", written over a horizontal line.

Hon. David R. Grand
United States Magistrate Judge

Dated: September 14, 2021